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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MIGUEL RODRIGUEZ, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

CAESARS ENTERTAINMENT, INC.,

Defendant.

Case No. 2:23-cv-01447

NOTICE OF RELATED CASES

1 TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 In accordance with Local Rule 42-1(a), Plaintiffs Thomas and Laura McNicholas (the
3 “McNicholas Plaintiffs”) file the instant Notice of Related Cases. The following cases call for a
4 determination of the same or substantially identical questions of law and fact and, therefore, are
5 likely to entail substantial duplication of labor for the judges assigned each respective case.

6 The cases include:

- 7 1. *Thomas McNicholas, et. al. v. Caesars Entertainment, Inc.*, No. 3:23-cv-00470. The
8 McNicholas case is a putative class action that revolves around a data breach that
9 Defendant Caesars Entertainment, Inc. (“Caesars”) disclosed on or about September 7,
10 2023, that affected the sensitive information of its customers (the “Data Breach”). The
11 McNicholas Plaintiffs bring claims against Caesars for negligence, negligence per se,
12 breach of implied contract, unjust enrichment, and violation of the Illinois Consumer
13 Fraud Act. A copy of the *McNicholas* Complaint is attached as Exhibit 1.
- 14 2. *Rodriguez v. Caesars Entertainment, Inc.*, No. 2:23-cv-01447. Plaintiff Miguel
15 Rodriguez’s complaint also is a putative class action relating to the Data Breach.
16 Plaintiff Rodriguez brings claims against Caesars for negligence, negligence per se,
17 unjust enrichment, breach of implied contract, violation of the California Customer
18 Records Act, violation of the California Unfair Competition Act, and violation of the
19 California Consumer Legal Remedies Act. A copy of the *Rodriguez* Complaint is
20 attached as Exhibit 2.
- 21 3. *Garcia v. Caesars Entertainment, Inc.*, No. 2:23-cv-01482. Plaintiff Paul Garcia’s
22 complaint is a putative class action against Caesars relating to the Data Breach.
23 Plaintiff Garcia brings claims for negligence and negligence per se, breach of implied
24 contract, and unjust enrichment. A copy of the *Garcia* Complaint is attached as
25 Exhibit 3.
- 26 4. *Giuffre v. Caesars Entertainment, Inc.*, No. 2:23-cv-01483. Plaintiff Alexis Giuffre’s
27 complaint is a putative class action against Caesars relating to the Data Breach.

1 Plaintiff Giuffre brings claims for negligence and negligence per se, breach of implied
2 contract, and unjust enrichment. A copy of the *Giuffre* Complaint is attached as
3 Exhibit 4.

4 5. *Lackey v. Caesars Entertainment, Inc.*, No. 2:23-cv-01562. Plaintiff David Lackey's
5 complaint is a putative class action against Caesars relating to the Data Breach.
6 Plaintiff Lackey brings claims for negligence, negligent misrepresentation, breach of
7 implied contract, unjust enrichment, violation of the Nevada Consumer Fraud Act, and
8 violation of the Virginia Data Breach Notification Law. A copy of the *Lackey*
9 Complaint is attached as Exhibit 5.

10 These cases should be related because they arise out of the same nucleus of facts and
11 involve the same legal and factual issues. The cases bring actions against Caesars and have
12 several overlapping claims. All plaintiffs allege that Caesars failed to adequately protect their
13 sensitive personal information and as a result, the Data Breach occurred. Additionally, the
14 actions were all brought as putative class actions.

15 Additionally, considering the identical, similar, and overlapping legal issues presented in
16 these cases, the McNicholas Plaintiffs submit that litigating these cases separately will create a
17 substantial duplication of labor and waste of judicial resources if heard by different judges.
18 Moreover, inconsistent rulings may result.

19 Accordingly, these two actions are Related Cases for the purposes of Local Rule 42-1(a).
20 The McNicholas Plaintiffs believe that the *Rodriguez* action, *Garcia* action, the *Giuffre* Action,
21 and the *Lackey* action should be transferred to the Reno court, as Caesars is headquartered in
22 Reno and such transfer creates additional efficiencies.

23 Dated: October 3, 2023

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24
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CERTIFICATE OF SERVICE

I hereby certify that on October 3, 2023, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the email addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.

Dated: October 3, 2023

/s/ Bryan Snyder

BRYAN SNYDER

INDEX OF EXHIBITS

Exhibit No.	Description	No. of Pages
1.	<i>McNicholas</i> Complaint	22
2.	<i>Rodriguez</i> Complaint	49
3.	<i>Garcia</i> Complaint	44
4.	<i>Giuffre</i> Complaint	44
5.	<i>Lackey</i> Complaint	43